

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DRESSER-RAND COMPANY,

Plaintiff,

-against-

PETRÓLEOS DE VENEZUELA, S.A. and
PDVSA PETRÓLEO, S.A.,

Defendants.

Case No.: 1:19-cv-002689-LLS

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE, that pursuant to Rule 30 of the Federal Rules of Civil Procedure, defendant Petróleos de Venezuela, S.A., by and through its undersigned attorneys, will take the deposition upon oral examination of the following persons:

1. Erik Scherzer, Credit and Collections Manager of Dresser-Rand Company, on July 13, 2020 at 10:00 a.m.;
2. An officer, director, or managing agent of Dresser-Rand Company with knowledge of: (a) Citibank, N.A.'s refusal to accept, rejection of, and/or alleged non-receipt of funds transferred by PDVSA as payment to Dresser-Rand under the Note; (b) the possibility of designating a different bank for Dresser-Rand's receipt of payments under the Note; (c) the possibility of Dresser-Rand's acceptance of payments under the Note in Euros rather than U.S. Dollars; and (d) the schedule of payments to Dresser-Rand under the Note, on July 14, 2020, at 10:00 a.m.

The depositions will be conducted remotely utilizing a secure web-based deposition service. Please contact the undersigned attorneys at least five (5) calendar days before the deposition if you plan to appear and participate to receive the necessary remote access

credentials, call-in numbers, and other information. Note that the court reporter may also be remote for the purposes of reporting the proceedings and may or may not be in the presence of the deponent. The depositions will continue from day-to-day until completed.

Dated: June 5, 2020

HOGAN LOVELLS US LLP

By: /s/ Dennis H. Tracey, III
Dennis H. Tracey, III
Robin L. Muir
390 Madison Avenue
New York, New York 10017
Tel: (212) 918-3000
Fax: (212) 918-3100
dennis.tracey@hoganlovells.com
robin.muir@hoganlovells.com

Counsel for Defendants Petróleos de Venezuela, S.A. and PDVSA Petróleo, S.A